

November 18, 2019

Town of West Hartford

West Hartford, Ct.

Attn: Todd Dumais

Fintech Village, Asbestos Abatement, Demolition, PCB Soil Remediation

Executive Summary

This Inland Wetlands application is to allow Bestech Inc. to commence the demolition and PCB remediation of the Undergraduate Building and the Library Building. The Social Work building has been demolished to the slab(s) and foundations while we await approval from the EPA/DEEP to commence with the soil remediation. Upon completion of the soil remediation the slabs, foundations and footings will be removed, and the resultant voids sloped to OSHA standards.

The Undergraduate Building (primary focus of this application) will be demolished down to the first-floor slab, which is scheduled to remain along with the foundations and footings for eventual construction of a new structure upon same. Soil remediation entails the removal of a minimal amount of material (346 CY ranging in depths from one to two feet) that is contaminated with PCB's both greater than, and less than 50 PPM.

The Library Building (later application to follow) will be demolished in its entirety following the same protocol(s) as the Social Work Building. Soil remediation entails the removal of a minimal amount of material (269 CY ranging in depths from one to two feet)



that is contaminated with PCB's both greater than, and less than 50 PPM.

I would like to summarize the Bestech contract with Ideanomics, and the efforts we have gone through to comply with all Town, State, and Federal regulations.

Existing Conditions:

The former UConn Campus is contaminated with Asbestos and PCB's. The asbestos was used in insulating and flooring materials when the campus was built. The PCB's were found in window caulking and paint used when the campus was built. The PCB's in the window caulking have both leached into the masonry walls surrounding them, and then into the soil. The CT DEEP has a Notice of Violation (NOV) on the site that stems from the PCB's washing off the caulking over the years and into the soil. This NOV was originally issued to UConn. The soil contamination starts at the building edge and proceeds out from the building. In some areas just a few feet, in other areas 50 ft, from a few inches deep to a few feet deep.

Bestech Inc. Contract Responsibilities:

Bestech Inc. was contracted by Ideanomics this past June to remove and dispose of the asbestos, demolish and dispose of the buildings, and to excavate and dispose of the PCB contaminated soil. The basis for our scope of work was an intensive one-year sampling and plan writing program by Eagle Environmental. The plans have been submitted to CT DEEP and USEPA and approved. All the disposal, both asbestos and PCB waste, is being done out of state. The order that these tasks will be performed is asbestos abatement first, demolition second, and PCB soil abatement last on a per building basis.



Current Status:

Bestech has removed all interior asbestos from the Undergraduate Building and is close to completing the abatement of the Library Building.

Throughout this process we have conferred with the State of CT Dept. of Health about the Asbestos, the State of CT DEEP and the USEPA about the PCB issues.

We have filed an asbestos notification form with the State of CT for the asbestos.

We have submitted a CWP, contractor work plan, for the PCB work both with the CT DEEP and the USEPA. The CT DEEP and the USEPA have been in contact many times and are working together on this issue. Our contact at CT DEEP is Gary Trombly, gary.Trombly@ct.gov, and at the USEPA it is Kimberly Tisa, tisa.Kimberly@epa.gov. Town staff have been given copies of these plans and the CT DEEP and USEPA Response of "no additional comments", which is their way of approving the plans.

The owner, Ideanomics, has engaged Eagle Environmental, both for Asbestos and PCB testing, plan writing, and quality control. Eagle wrote the SIP, self-implementing plan, for the PCB work, that was submitted to the USEPA, the CT DEEP and approved. Eagle has been monitoring the asbestos abatement and testing the asbestos areas when the asbestos has been removed. Eagle will be monitoring the demolition and the PCB soil on a full-time basis. When we think we are complete Eagle will perform confirmatory sampling to ensure the PCB contaminated soil is properly remediated.

James Newbury

President

Bestech Inc.